REMARKS

The present Amendment amends claims 1-4, 6, 8-11, 13 and 15-18, leaves claims 5, 7, 12 and 14 unchanged and adds new claim 19. Therefore, the present application has pending claims 1-19.

Claims 1-18 stand rejected under 35 USC §103(a) as being unpatentable over Martin (U.S. Patent No. 5,504,873) in view of AKizawa (U.S. Patent No. 5,548,724). This rejection is traversed for the following reasons. Applicants submit that the features of the present invention as now more clearly recited in claims 1-18 are not taught or suggested by Martin or Akizawa whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to the claims to more clearly describe features of the present invention. Particularly, amendments were made to the claims to more clearly recite that the present invention is directed to a storage device system and a method of activating a storage device system, wherein the storage device system includes a plurality of storage devices in which information is stored, a storage device control section for controlling storage of information in the storage devices, a connection unit connected to the storage device control section and first and second processors.

According to the present invention, the first processor is connected to a local area network (LAN) external to the storage device system and converts data of a file access form received over the LAN into data of a block access form.

Further, according to the present invention the second processor is connected to the storage device control section via the connection unit, accesses the storage devices via the connection unit and the storage device control section in response to data of the block access form from the first processor and controls activation of the first processor.

Still further, according to the present invention as described, for example, on page 19, lines 1-16 of the Substitute Specification, the control of activation of the first processor by the second processor is performed, for example, by controlling the supply of power to the first processor.

The above described features of the present invention now more clearly recited in the claims are not taught or suggested by any of the references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention as now more clearly recited in the claims are not taught or suggested by Martin or Akizawa whether taken individually or in combination with each other as suggested by the Examiner.

Martin discloses a mass data storage and retrieval system illustrated, for example, in Fig. 2a and 2b having a plurality of information storage means forming a mass storage library, a plurality of data recording modules for reading information from and writing information to the information storage means, an interface means for bi-directionally coupling the data recording modules to a host computer and for simultaneously reading and writing of information from and to one of the information storage means and a control computer for generating a first command signal to the mass storage library for loading one of the information storage means in one of the data recording

modules and generating a second command signal for coupling the interface means to the data recording module loading with the information storage means.

In the Office Action the Examiner alleges that Martin teaches, for example, in col. 4, line 48-67 that the activation of a first processor by a second processor is disclosed. Particularly, the Examiner alleges that the first processor corresponds to the control processor 114 and the second processor corresponds to the control processor 116 as taught by Martin.

However, the control processors 114 and 116 as taught by Martin do not at any point perform operations corresponding to the operations of the present invention as recited in the claims. Control processors 114 and 116 are part of the control subsystem 40 which allocates and de-allocates the common resources present in the mass storage library system 10. However, the control processors 114 and 116 do not correspond to the first and second processors included in the storage system wherein the first processor is connected to a LAN external to the storage device system and converts data of a file access form received over the LAN into data of a block access form, and the second processor is connected to the storage device control section via the connection unit, accesses the storage devices via the connection unit and the storage device control section in response to data of the block access form issued from the first processor and that controls activation of the first processor as in the present invention as recited in the claims.

One of the unique features of the present invention as recited in the claims is that the second processor controls activation of the first processor by, for example, controlling the supply of power to the first processor. Such a

teaching cannot be found at any point in Martin particularly with regard to the alleged first and second processors 114 and 116.

Thus, Martin fails to teach or suggest a first processor that is connected to a LAN external to the storage device system that converts data of a file access form received over the LAN into data of a block access form as recited in the claims.

Further, Martin fails to teach or suggest a second processor that is connected to the storage device control section via the connection unit, that accesses the plurality of storage devices via the connection unit and the storage device control section in response to data of the block access form issued from the first processor and that controls activation of the first processor as recited in the claims.

Therefore, as is quite clear from the above, the features of the present invention as now more clearly recited in the claims are not taught or suggested by Martin.

The above described deficiencies of Martin are not supplied any of the other references of record particularly Akizawa. Accordingly, combining the teachings of Martin and Akizawa in the manner suggested by the Examiner in the Office Action still fails to teach or suggest the features of the present invention as now more clearly recited in the claims.

Akizawa is merely relied upon by the Examiner for an alleged teaching of converting information of a first form received over the external network into information of a second form. However, at no point is there any teaching or suggestion in Akizawa of the above described features of the present

invention wherein the data of a file access form are converted into data of a block access form as in the present invention as recited in the claims.

Further, Akizawa do not teach or suggest the other features of the present invention now more clearly recited in the claims which are not taught or suggested by Martin. For example, Akizawa does not teach or suggest that the second processor activates the first processor. Such features are clearly are not taught or suggested by Akizawa.

Thus, Akizawa, the same as Martin fails to teach or suggest a first processor that is connected to a LAN external to the storage device system, that converts data of a file access form received over the LAN into data of a block access form as recited in the claims.

Further, Akizawa, similar to Martin fails to teach or suggest a second processor that is connected to the storage device control section via the connection unit, that accesses the storage devices via the connection unit and the storage device control section in response data of the block access form issued from the first processor and that controls activation of the first processor as recited in the claims.

Therefore, as is quite clear from the above, both Martin and Akizawa suffer from the same deficiencies relative to the features of the present invention as now more clearly recited in the claims and as such the combination of Martin and Akizawa does not anticipate nor render obvious the features of the present invention as now more clearly recited in the claims. Accordingly, reconsideration and withdrawal of the 35 USC §103(a) rejection of claims 1-18 as being unpatentable over Martin in view of Akizawa is respectfully requested.

As indicated above, the present Amendment adds new claim 19. New claim 19 depends from claim 1. Therefore, the same arguments presented above with respect to claim 1 apply as well to new claim 19. New claim 19 recites additional features that the first and second processors form part of a communication control section. Such features are not taught or suggested by any of the references of record whether taken individually or in combination with each other.

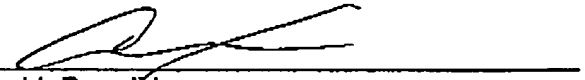
The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-18.

In view of the foregoing amendments and remarks, applicants submit that claims 1-19 are in condition for allowance. Accordingly, early allowance of claims 1-19 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C., Deposit Account No. 50-1417 (TMI-5010).

Respectfully submitted,

MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C.



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